



February 23, 2010

Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2009
Custom Teleconnect, Inc. – Filer ID 815080

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of Custom Teleconnect, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email tombyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to Custom Teleconnect, Inc.

Attachments

cc: Best Copy and Printing (via email to FCC@BCPIWEB.COM)
D. Morgan, CTI
file: CTI- CPNI
tms: FCCx2010-1

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2009
Date Filed: February 23, 2010
Name of Company covered by this certification: Custom Teleconnect, Inc.
Form 499 Filer ID: 815080
Name of Signatory: Vicki Crowder
Title of Signatory: President

I, Vicki Crowder, certify and state that:

1. I am the President of Custom Teleconnect, Inc., and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification as Exhibit A is an accompanying statement explaining how Custom Teleconnect, Inc.'s procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Vicki Crowder, President
Vicki Crowder, President
Custom Teleconnect, Inc.

2/22/2010
Date

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers – Not applicable
Summary of customer complaints – Not applicable

Attachment A
Statement of CPNI Procedures and Compliance

Custom Teleconnect, Inc.

Calendar Year 2009

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance

Custom Teleconnect, Inc. ("Company" or "CTI") operates solely as a provider of operator services to pay telephones and hospitality locations and as a provider of inmate operator services to confinement facilities. As such CTI provides only operator assisted call completion services to transient users. Therefore, all of its services consist of casual traffic provided outside of any subscribed service relationship. Moreover, CTI does not market its services to end users in any fashion. Its marketing efforts are directed towards aggregators and such efforts do not include the use of CPNI.

Should CTI expand its business in the future to include the provision and/or marketing of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical or account information, that it notifies customers of account changes.

The Company does not bill customers directly. Instead, the Company provides rated call records to billing companies and billed calls appear on the customer's local exchange company bill or credit card bill. To the extent that the billing companies act as agents for the Company and provides call detail information to customers over the telephone, Custom Teleconnect has contacted its billing company and received written assurance of the billing company's compliance with 47 CFR Subpart U.

In lieu of contacting the Company's billing companies, Customers may contact CTI directly to review or discuss the CTI portion of the LEC bill. If a customer is not able to provide the call detail information to qualify for the FCC exemption, the Company requires the customer to either call back with the information, or fax a copy of the bill pages directly to CTI and CTI will call the customer back the telephone number of record.

Procedures have been in place since the Company's inception in 1993 to protect the privacy of call detail from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to such information. CPNI protection is addressed in the Company employee manual. The Company reviews CPNI procedures annually with all employees and has instituted a corresponding disciplinary process to ensure that its employees understand and comply with restrictions regarding the use and disclosure of, and access to CPNI and call detail records.

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance
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The Company does not provide customers with web access to customer records. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of changes.

The Company has in place procedures to maintain records of all breaches of call detail records and CPNI discovered, and to notify law enforcement, the United States Secret Service and the FBI in the event of a breach of customers' CPNI and/or call detail records, and to ensure that customers are notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company does not have any retail locations and therefore does not disclose CPNI at in-store locations.

Law enforcement requests for call detail records are only granted if submitted by verified law enforcement agencies.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or call records in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.